

**Merchant & Gould**

An Intellectual Property Law Firm

Merchant & Gould P.C.  
701 Fifth Avenue  
Suite 4100  
Seattle, WA 98104-7097

A Professional Corporation

**Fax Transmission**

October 17, 2007

TO:

Attn: Examiner Anh Ly Commissioner for Patents P.O. Box 1450 Alexandria, Virginia 22313-1450	FROM: Ryan T. Grace  OUR REF: 50037.05USU1
---	--

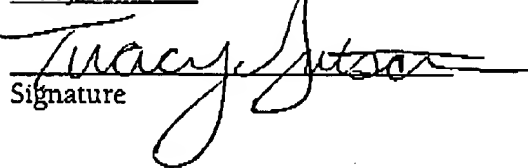
Total pages, including cover letter: 8

PTO FAX NUMBER 1-571-273-4039

If you do NOT receive all of the pages, please telephone us at 206.342.6200, or fax us at 206.342.6201.

Title of Document Transmitted: Applicant Initiated Interview Request FormApplicant: Ghim-Sim Chua et al.Serial No.: 09/927,096Filed: August 9, 2001Group Art Unit: 2162Our Ref. No. 50037.05USU1Confirmation No. 3792By: Name: Ryan T. GraceReg. No.: 52,956

I hereby certify that this paper is being transmitted by facsimile to the U.S. Patent and Trademark Office on the date shown below.

Tracy Gurscher  
Signature10-17-07  
Date

## Applicant Initiated Interview Request Form

Application No.: 09/927,096

First Named Applicant: Chua

Examiner: Ly

Art Unit: 2162

Status of Application: Pending

**Tentative Participants:**

(1) Examiner Ly

(2) John Breene

(3) Ryan Grace

(4)

**Proposed Date of Interview:** Please call      **Proposed Time:** Please call**Type of Interview Requested:**(1) ☒ Telephonic      (2) ☐ Personal      (3) ☐ Video Conference**Exhibit To Be Shown or Demonstrated:** ☐ Yes      ☐ No

If yes, provide brief description:

---

### Issues To Be Discussed

---

- (1) Consideration of arguments for Claim 1 below and amended claim 21.

Claim 21 is proposed for amendment as set forth below to further clarify several features of the claim. Claim 21 is proposed for purposes of appeal. The other claims in this application will not be amended in that the proposed combination fails to teach all the limitations of the claims and the proposed combination would produce a nonsensical set of instructions.

Independent claim 1 includes the following combination of features that are not taught or suggested by the cited references:

a search engine manager having a client interface configured to allow the search engine manager to communicate with a client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper, wherein the search engine manager is configured to receive a search query from a client and to translate the search query to a standard query, wherein the standard query is universally formatted for a plurality of search engine wrappers registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engine wrappers registered with the search engine manager, and

each of the search engine wrappers having a manager interface configured to provide standardized communication between the search engine wrapper and the search engine manager, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine, wherein each of the search engine wrappers are configured to translates the standard query into a different native format, and to return results from the registered search engine to the search engine manager.

The above combination of features are not taught or otherwise suggested by the cited references. The Office Action attempts to fragment the references into a plurality of unassociated pieces. The Office Action then attempts to puzzle the fragments together to come up with the features of the claims. However, the puzzled fragments fail to consider both the references and the claims as a whole and the resulting proposed combination is nonsensical. The references explicitly teach away from features of the claims. The office action, however, attempts to ignore these teachings and reengineer the three references into something far different than what is being taught.

The office action states that Pan teaches "wherein the standard query is universally formatted for a plurality of search engines registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engines registered with the search engine manager." *Office Action*, page 3. This statement is not true. Pan teaches receiving a search term in a first language (e.g. French). A search engine is then selected from multiple search engines. The query term in the first language is then translated to the specific language (e.g. English) used by the selected search engine. Pan is teaching the exact opposite of the statement in the Office Action. Pan is teaching that the query is translated into a specific grammatical language associated with the search engine. *See Pan* col. 8, lines 30-60. Independent claim 1 specifically recites "a search engine manager having a client interface configured to allow the search engine manager to communicate with a client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper, wherein the search engine manager is

configured to receive a search query from a client and to translate the search query to a standard query, wherein the standard query is universally formatted for a plurality of search engine wrappers registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engine wrappers registered with the search engine manager." Pan cannot possibly teach universal formatting as the Office Action suggests because the Pan is only concerned about a single selected search engine and if the query was universally formatted the search engines associated with other languages simply would not understand the query.

The Office Action then cites to Golding as teaching that a search engine normalizes the query. *Office Action*, page 5. The Office Action attempts to combine this feature with Pan's teaching above. However, such a combination is contrary to the teaching of Pan that the query is translated into a query that is specific for the search engine. Furthermore, Golding is teaching that the search engine normalizes the query. *See Golding* at col. 6, lines 55-60. Independent claim 1 recites that a search engine manager generates a standard query. Independent claim 1 distinguishes the search engine manager from the search engine. The Office Action is attempting to read features out of the cited reference and out of the claims. This reconstruction is not allowed in that the references and the claims must be read as a whole.

The Office Action continues by citing to Chidlovskii as teaching a wrapper. Applicants assert that there are hundreds of different types of wrappers in the software industry. Wrappers are used for all sorts of things. The mere fact that Chidlovskii teaches a wrapper, does not mean that Chidlovskii teaches a wrapper as presented in claim 1. Claim 1 specifically recites "each of the search engine wrappers having a manager interface configured to provide standardized communication between the search engine wrapper and the search engine manager, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine, wherein each of the search engine wrappers are configured to translates the standard query into a

different native format, and to return results from the registered search engine to the search engine manager." Chidlovskii teaches a wrapper for extracting data. Chidlovskii states that a wrapper is a tool used by a meta-searcher that scans the HTML files returned by the search engine, drops the markup instructions and extracts the information related to the query. Then the wrapper takes the answers from the different providers, puts them in a new format and generates an HTML file that can be viewed by the user. *See Chidlovskii* at col. 5, lines 9-25. Chidlovskii does not teach a search engine wrapper that translates a standard query received from a search engine manager into a native format query associated with the registered search engine. Applicants respectfully request reconsideration.

Independent claim 21 includes the following combination of features that are not taught or suggested by the cited references:

providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper;

providing at least one search engine wrapper having a manager interface configured to provide standardized communication between the search engine manager and the search engine wrapper, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine, wherein the at least one search engine wrapper includes a wrapper ID, wherein the search engine wrapper presents the wrapper ID to a search engine store to identify the wrapper during a registration process;

discovering at least one search engine registered with a search system by accessing the search engine store and identifying at least one search engine wrapper ID associated with the at least one search engine;

receiving a query initiated by a client accessing the search system;

building a standard query from the query initiated by the client, wherein the standard query is universally configured to be understandable by a plurality of engine wrappers;

transmitting the standard query to a plurality of search engine wrappers, wherein each search engine wrapper is configured to translate the search query into a native format that is unique to a search engine registered with the search engine wrapper;

requesting a response from each of the search engine wrappers the response including a progress update for the standard query as it is executed and the results of the standard query; and

receiving responses from each of the search engine wrappers.

The office action states that Pan teaches "wherein the standard query is universally formatted for a plurality of search engines registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engines registered with the search engine manager." *Office Action*, page 3. This statement is not true. Pan teaches receiving a search term in a first language (e.g. French). A search engine is then selected from multiple search engines. The query term in the first language is then translated to the specific language (e.g. English) used by the selected search engine. Pan is teaching the exact opposite of the statement in the Office Action. Pan is teaching that the query is translated into a specific grammatical language associated with the search engine. *See Pan* col. 8, lines 30-60. Independent claim 21 specifically recites "providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper," and "building a standard query from the query initiated by the client, wherein the standard query is universally configured to be understandable by a plurality of engine wrappers." Pan cannot possibly teach universal formatting as the Office Action suggests because Pan is only concerned about a single selected search engine and if the query was universally formatted the search engines associated with other languages simply would not understand the query.

The Office Action then cites to Golding as teaching that a search engine normalizes the query. *Office Action*, page 5. The Office Action attempts to combine this feature with Pan's teaching above. However, such a combination is contrary to the teaching of Pan that the query is translated into a query that is specific for the search

engine. Furthermore, Golding is teaching that the search engine normalizes the query. See *Golding* at col. 6, lines 55-60. Independent claim 21 recites that a search engine manager generates a standard query. Independent claim 21 distinguishes the search engine manager from the search engine. The Office Action is attempting to read features out of the cited reference and out of the claims. This reconstruction is not allowed in that the references and the claims must be read as a whole.

The Office Action continues by citing to Chidlovskii as teaching a wrapper. Applicants assert that there are hundreds of different types of wrappers in the software industry. Wrappers are used for all sorts of things. The mere fact that Chidlovskii teaches a wrapper, does not mean that Chidlovskii teaches a wrapper as presented in claim 21. Claim 21 specifically recites "transmitting the standard query to a plurality of search engine wrappers, wherein each search engine wrapper is configured to translate the search query into a native format that is unique to a search engine registered with the search engine wrapper." Chidlovskii teaches a wrapper for extracting data. Chidlovskii states that a wrapper is a tool used by a meta-searcher that scans the HTML files returned by the search engine, drops the markup instructions and extracts the information related to the query. Then the wrapper takes the answers from the different providers, puts them in a new format and generates an HTML file that can be viewed by the user. See *Chidlovskii* at col. 5, lines 9-25. Chidlovskii does not teach a search engine wrapper that translates a standard query received from a search engine manager into a native format query associated with the registered search engine.

Furthermore, applicants cannot find any teaching or suggestion in any of the references of "wherein the at least one search engine wrapper includes a wrapper ID, wherein the search engine wrapper presents the wrapper ID to a search engine store to identify the wrapper during a registration process." Applicants also cannot find any teaching of "discovering at least one search engine registered with a search system by accessing the search engine store and identifying at least one search engine wrapper ID associated with the at least one search engine." Applicants respectfully request reconsideration.

An interview was conducted on the above-identified application on \_\_\_\_\_. NOTE: This form should be completed by applicant and submitted to the examiner in advance of the interview (see MPEP § 713.01).

This application will not be delayed from issue because of applicant's failure to submit a written record of this interview. Therefore, applicant is advised to file a statement of the substance of this interview (37 CFR 1.133(b)) as soon as possible.

  
\_\_\_\_\_  
Applicant/Applicant's Representative Signature

\_\_\_\_\_  
Examiner/SPE Signature

Ryan T. Grace  
\_\_\_\_\_  
Typed/Printed Name of Applicant or Representative

52,956  
\_\_\_\_\_  
Registration Number, if applicable